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Counsel for U.S. Nonwovens Corp.
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Dawn Kirby, Esq.

Hearing Date: December 20, 2018
Hearing Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re : Chapter 11
:
SEARS HOLDINGS CORPORATION, *et al.*, : Case No. 18-23538 (RDD)
:
: (Jointly Administered)
Debtors. :
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**NOTICE OF MOTION OF U.S. NONWOVENS CORP. SEEKING ENTRY
OF AN ORDER ALLOWING ADMINISTRATIVE EXPENSE
CLAIM PURSUANT TO 11 U.S.C. §503(b)(9)**

PLEASE TAKE NOTICE, that upon the annexed motion (the "Motion ") of U.S. Nonwovens Corp. by its counsel, DelBello Donnellan Weingarten Wise & Wiederkehr, LLP, the undersigned will move this Court, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601 the 20th day of December, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard for an order pursuant to § 105(a) and 503(b)(9) of title 11, United States Code, 11 U.S.C. § 101, et seq. (the "Bankruptcy Code") allowing U.S. Nonwovens Corp.'s administrative expense claim, and such other and further relief as may be just and proper under the circumstances.

PLEASE TAKE NOTICE, that objections to the relief requested in the Motion must be in writing, stating with specificity the basis or bases on which such party in interest objects to the within Motion, filed with the Bankruptcy Court at the Court's website www.nysb.uscourts.gov

(Password and Login Required) and must be served upon DelBello, Donnellan, Weingarten, Wise & Wiederkehr, LLP, One North Lexington Avenue, White Plains, New York 10601, Attn: Dawn Kirby, Esq., so as to be filed and served no later than seven (7) days prior to the hearing date.

Dated: White Plains, New York
November 30, 2018

DELBELLO DONNELLAN WEINGARTEN
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By: /s/ Dawn Kirby
Dawn Kirby